

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|-----------------------|---|-----------------------------|
| DR. MANHUA MANDY LIN  | : | Filed Under Seal            |
|                       | : |                             |
| Plaintiff             | : |                             |
|                       | : |                             |
| vs.                   | : | CIVIL ACTION NO. 02-cv-3612 |
|                       | : |                             |
| ROHM AND HAAS COMPANY | : |                             |
|                       | : |                             |
| Defendant             | : | JURY TRIAL DEMANDED         |
|                       | : |                             |

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**MOTION OF PLAINTIFF, DR. MANHUA MANDY LIN, FOR RECONSIDERATION  
OF THE ORDER GRANTING SUMMARY JUDGMENT AS TO COUNTS II AND III  
OF PLAINTIFF'S AMENDED COMPLAINT**

Plaintiff, Dr. Manhua Mandy Lin, by and through her counsel, Leonard, Tillery & Sciolla, LLP, hereby moves, pursuant to Local Rule 7.1, for reconsideration of the Order of January 26, 2004 granting Defendant's Motion for Summary Judgment as to Counts II and III of Plaintiff's Amended Complaint. In support of this motion, Plaintiff relies on the Memorandum of Law and Affidavit of Dr. Manhua Mandy Lin attached hereto together with the Memoranda of Law and Record from the underlying response to Defendant's Motion for Summary Judgment and Plaintiff's Motion for Reconsideration

of Order Granting Summary Judgment Regarding Breach of Contract which are incorporated herein by reference.

Respectfully submitted,

LEONARD, TILLERY & SCIOLLA, LLP

By:\_\_\_\_\_

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